

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

VANCE DOTSON,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendants.

)
) JURY TRIAL DEMANDED
)
)

) Case No.

CN-25-605-SLP

FILED

JUN 04 2025

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY aw, DEPUTY

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual, statutory and punitive damages brought by Plaintiff Vance Dotson, an individual consumer, against Defendants, Experian Information Solutions, Inc., (“Experian”) for violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (hereinafter “FCRA”).

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C. § 1681(p) 28 U.S.C 1331. Venue in this District is proper in that the Defendants transact business here, and the conduct complained of occurred here.

III. PARTIES

3. Plaintiff, Vance Dotson, is a natural person residing in Oklahoma City, Oklahoma. Plaintiff is a consumer as defined by the Fair Credit Reporting Act, 15 U.S.C. §1681a, (b) and (c).

4. Experian is a California corporation duly authorized and qualified to do business in the State of Oklahoma.

5. Upon information and belief, Experian is a “consumer reporting agency that compiles and maintains files on consumers on a nationwide basis” as defined by 15 U.S.C. § 1681a(p). Upon information and belief, Experian is regularly engaged in the business of compiling and maintaining files on consumers on a nationwide basis for the purpose of furnishing consumer reports to third parties bearing on a consumer’s credit worthiness, credit standing, or credit capacity, each of the following regarding consumer residing nationwide:

- a. Public record information;
- b. Credit account information from persons who furnish that information regularly and in the ordinary course of business.
- c. For purposes of this Complaint, any reference to “Defendant” or “Experian” includes, without limitation, the named Defendant, its agents, employees, representatives, attorneys, contractors, business associates, partners, predecessors, successors, assigns, affiliates, parents, subsidiaries, officers, directors, managing agents, and any

person or entity acting or purporting to act on its behalf, with its authorization, ratification, or knowledge. It also includes any fictitiously named defendants, and any other third party that participated in, contributed to, or benefited from the violations alleged in this Complaint, whether directly or indirectly.

IV. FACTS OF THE COMPLAINT

FIRST A QUICK BACKGROUNG ON CREDIT REPORTING

6. Credit Reporting is a fact of modern life.
7. Plaintiff like other consumer in America has no choice on whether private companies such as Experian maintain and sell credit reports on Plaintiff to other companies typically as “users” of credit reports.
8. Experian is not allowed to report false information.
9. Experian is not allowed to report incomplete information.
10. Experian is not allowed to report inaccurate information.
11. Experian is not allowed under the law to report incomplete information.
12. Congress passed the FCRA and specifically stated in Section 1681(a)(4) that “There is a need to insure that consumer reporting agencies exercise their grave responsibilities with fairness, impartiality, and a respect for the consumers right to privacy.”

V. THE DISPUTE METHOD OF CORRECTING INACCURATE, FALSE AND INCOMPLETE INFORMATION UNDER THE FCRA

13. When a consumer, such as Plaintiff realizes there is false or incomplete information on their credit reports or consumer disclosures, Plaintiff has the right to dispute this with Experian.

14. The consumer simply disputes (verbally by phone, online, by fax, or by mail) to Experian and requests an investigation of information so that the information will be corrected (if possible) or deleted.

15. Experian must notify the furnisher(s) of the dispute within the time limits set forth by the FCRA.

16. If Experian does not notify the furnisher(s) as required by the FCRA, this is a violation of the FCRA by Experian.

17. Experian must do its own reasonable investigation into the dispute which includes examining all information Experian has or can reasonably obtain to assist in the investigation.

18. Experian must correct inaccurate or incomplete information or delete the account if the account to be inaccurate or incomplete or cannot be verified for accuracy also all **SSN Variations of Plaintiff Social Security Numbers**.

VI. THE ACCOUNTS AT ISSUE

19. Plaintiff disputed Account that had errors on Experian reports that Experian did not make accurate or complete and the Experian did not delete.

Experian knew that the furnishers of the information on Account were unreliable but failed to factor this into the investigations (if any) of Experian.

20. The Account are as follows: American Express 3499924574460473, Bank of America 440066XXX, BMW Financial Services 10031XXX, CBNA 512106XXXX, CCS/First National Bank 423980XXXX, CCS/First Savings Bank 543360XXXX, Celtic Bank/Contfinco 534636XXXX, Citi Cards 542418XXXX, Communication FCU 43352XXXX, Cortrust Bank 543668XXXX, Discovery Bank 601120XXXX, FSB Blaze 518213XXXX, JPMCB Card 414720XXXX, JPMCB 426690XXXX, JPMCB 438857XXXX, JPMCB 546604XXXX, Navy Federal Cr Union 5000001XXXX, Tinker FCU 470415XXXX, Tinker FCU 470415XXXX, Tinker FCU 967555XXXX, Chapter 7 22112371¹SAH

21. This account(s)s will be referred to as “Accounts” in the Complaint.

22. American Express, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

22 a Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

22 b Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

22 c Plaintiff disputed the incompleteness of the **Credit Limit** as incomplete.

22 d Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

23. Bank of America 440066XXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

23 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

23 b Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

23 c Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

23 d Plaintiff disputed the incompleteness of the **Terms** as incomplete.

24. BMW Financial Services 100313XXXXXXXXXX, February 6, 2025 report

(Ex. A Before **Annual Credit Report**)

24 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

24 b Plaintiff disputed the incompleteness of the **Balance** as incomplete.

24 c Plaintiff disputed the incompleteness of the **Balance Uploaded** as incomplete.

24 d Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

24 e Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

24 f Plaintiff disputed the incompleteness of the **Highest Balance** as incomplete.

24 g Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

25. CBNA 512106XXXXXXXXXX, February 6, 2025 report (Ex. A Before

Annual Credit Report)

25 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

25 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

25 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

25 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

25 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

25 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

26. CCS/First National Bank 423980XXXXXX, February 6, 2025 report (Ex. A
Before **Annual Credit Report**)

26 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

26 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

26 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

26 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

26 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

27. CCS/First Saving Bank 543360XXXXXX, February 6, 2025 report (Ex. A
Before **Annual Credit Report**)

27 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

27 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

27 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

27 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

27 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

28. Celtic Bank/Contfinco 534636XXXXXX, February 6, 2025 report (Ex. A
Before **Annual Credit Report**)

28 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

28 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

28 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

28 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

28 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

28 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

29. Citi Cards/CitiBank 542418XXXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

29 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

29 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

29 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

29 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

29 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

29 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

30. Communication FCU 433520XXXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

30 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

30 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

30 c Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

30 d Plaintiff disputed the incompleteness of the **Terms** as incomplete.

30 e Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

31. Cortrust Bank NA 543668XXXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

31 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

31 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

31 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

31 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

31 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

31 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

32. Discover Bank 601120XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

32 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

32 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

32 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

32 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

32 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

32 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

33. JPMCB CARD 414720XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

33 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

33 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

33 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

33 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

33 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

33 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

34. JPMCB CARD 426690XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

34 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

34 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

34 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

34 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

34 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

34 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

35. JPMCB CARD 438857XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

35 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

35 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

35 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

35 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

35 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

35 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

36. JPMCB CARD546604XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

36 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

36 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

36 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

36 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

36 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

36 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

37. Navy Federal CR Union5000001XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

37 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

37 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

37 c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

37 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

37 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

37 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

38. Tinker FCU 470415XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

38 a Plaintiff disputed the incompleteness of the **Account Number** as incomplete.

38 b Plaintiff disputed the incompleteness of the **Balance** as inaccurate.

38c Plaintiff disputed the incompleteness of the **Recent Payment** as incomplete.

38 d Plaintiff disputed the incompleteness of the **Monthly Payment** as incomplete.

38 e Plaintiff disputed the incompleteness of the **Terms** as incomplete.

38 f Plaintiff disputed the incompleteness of the **Payment History** as incomplete.

**VII. PLAINTIFF DISPUTED ERRORS BUT THE FALSE/INCOMPLETE
INFORMATION ON THE ACCOUNTS WAS NOT CORRECTED OR
DELETED BY DEFENDANT EXPERIAN**

39. On or about February 8, 2025, Plaintiff sent to Experian a written dispute letter related to the Account.

40. The Accounts were clearly described and identified with identification attached with the dispute.

41. The errors were clearly spelled out for Experian to understand the nature of the errors.

42. The errors consisted of inaccurate information and incomplete information on each of the Account.

43. Experian received the letter on or about February 13, 2025.

44. It is unclear from the response of Experian as to whether it notified the furnishers of the Accounts so Plaintiff has pled Experian did not properly notify and the details will come out in the deposition and written discovery of Experian.

45. The letter in relevant part, with redactions, is attached as Exhibit D and is incorporated herein.

VIII. DEFENDANT EXPERIAN CONDUCTS INVESTIGATION THAT VIOLATE THE FCRA AS EACH INVESTIGATION WAS DONE NEGLIGENTLY AND INTENTIONALLY OR RECKLESSLY OR IN WANTON DISREGARD OF PLAINTIFF AND THE FCRA

46. The disputes were simple – the specific inaccurate and incomplete information (and information that could not be verified) were identified for the Account as well as the incorrect personal information the report listed for Plaintiff.

47. Experian knew it was not allowed to report incomplete or inaccurate information or information that could not be verified but it did so anyway.

48. The fundamental rules of credit reporting as applied to Plaintiff Account were ignored, intentionally, recklessly, and/or negligently, by Experian.

49. Had Experian looked in even the most cursory way at the dispute, it would have seen that the errors were obvious, and the Account would have been corrected or deleted.

50. Experian failed to correct or delete all of the Account.

51. All actions of Experian fall woefully short of the requirements of FCRA for Experian to do reasonable investigation.

52. If Experian had performed even a negligent investigation, it is more likely than not that the false and incomplete information would have been deleted from Plaintiff credit reports.

53. A reasonable investigation would have certainly resulted in the correction or deletion of the Account as the information related to the Accounts consisted of data directly from credit reports produced by Experian.

54. The Accounts was described in detail, the errors was described in detail showing in words and in marking on the credit report pages (included with the dispute letter) the missing (incomplete) information, the incorrect information, and the contradictory information and it was obvious to Experian what needed to be done but it refused to reasonably investigate the Accounts.

55. Experian has refused to invest the time, money, and effort to carry out its federally mandate duties of investigation.

56. Experian negligently, recklessly, wantonly and/or willfully violated the requirement of a reasonable investigation as required under the FCRA.

57. Experian has continued to report, even after its wrongful investigation, the Accounts and thus failed to use all reasonable procedures to assure maximum possible accuracy of Plaintiff credit reports.

58. Experian has allowed users to access Plaintiff credit reports before the dispute, during the dispute time period, and even after the investigations (if any) by Experian were concluded.

59. Experian took less then 15 minutes on the re-investigation of the incomplete disputed information.

60. Certainly, after Plaintiff notified Experian, it knew the Account should not and could not remain on Plaintiff credit reports unless corrected.

61. But Experian refused not only to properly investigate under Section 1681i but also refused to remove the Account under Section 1681e(b) which is the maximum possible accuracy Section of the FCRA.

62. By allowing the Account to remain on Plaintiff credit reports with the inaccurate, incomplete, unverifiable and/or contradictory information, Experian created and allowed misleading information which would more likely than not mislead users of Experian reports to believe these Account were properly being reported and should be considered when evaluating Plaintiff for whatever purpose the users had when in fact the Account were required by law to be deleted when Experian decided to allow the Account to have inaccurate, incomplete, unverifiable and/or contradictory information.

63. The FCRA is clear that Account with inaccurate, incomplete, unverifiable and/or contradictory information are not allowed to remain on credit reports in a similar manner that obsolete accounts (even if they belong to consumer) are not allowed to remain on reports after the time period allowed by the FCRA.

64. Experian caused an inaccurate and misleading picture to appear of Plaintiff to users of reports by Experian when Experian refused to correct or delete the Accounts at issue.

IX. DAMAGES SUFFERED BY PLAINTIFF DUE TO THE ACTIONS OF EXPERIAN

65. Plaintiff has suffered actual damages because of these illegal actions by Experian in the form of anger, anxiety, emotional distress, fear, frustration, upset, humiliation, embarrassment, amongst other negative emotions (and Plaintiff had physical manifestations of such emotions), damage to credit, damage to Plaintiff creditworthiness, economic loss, money spent for mailing, as well as suffering from unjustified and abusive invasions of personal privacy. All such damages have suffered in the past, are continuing to be suffered, and such damages will continue in the future.

66. All of the illegal acts commented by Experian is willful because Experian gave in the disclosures “A Summary of Your Rights Under Fair Credit Reports Act”. That says **Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.**

67. All of the illegal acts commented by Experian is willful Experian know that the Plaintiff can sue because Experian gave in the disclosures “A Summary of Your Rights Under Fair Credit Reports Act. **You may seek damages from violators. If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.**

68. As a result of the actions and inactions of defendants, Plaintiff suffered damages, including *but not limited to*, mental and emotional distress, being denied credit, and being granted credit with a much higher interest rate. Experian knows that information has been release that considers Plaintiff credit worthiness <https://www.experian.com/blogs/insights/what-is-trended-data/>

69. Experian overseas team refused to process and correct the disputed information.

70. The ACDV forms and Metro 2 Communication will show all the incomplete and inaccurate information.

**X. DEFENDANT EXPERIAN REFUSED TO PROVIDE PLAINTIFF WITH A
FULL FILE DISCLOSURE
AS REQUIRED BY SECTION 1681g(a)(1) OF THE FCRA**

71. The Account(s) below Experian failed to give all information on file as in account numbers and missing data; American Express 3499924574460473, Bank of America 440066XXX, BMW Financial Services 10031XXX, CBNA

512106XXXX, CCS/First National Bank 423980XXXX, CCS/First Savings Bank 543360XXXX, Celtic Bank/Contfinco 534636XXXX, Citi Cards 542418XXXX, Communication FCU 43352XXXX, Cortrust Bank 543668XXXX, Discovery Bank 601120XXXX, FSB Blaze 518213XXXX, JPMCB Card 414720XXXX, JPMCB 426690XXXX, JPMCB 438857XXXX, JPMCB 546604XXXX, Navy Federal Cr Union 5000001XXXX, Tinker FCU 470415XXXX, Tinker FCU 470415XXXX, Tinker FCU 967555XXXX, Chapter 7 22112371SAH

72. This account(s) will be referred to as “Accounts” in the Complaint.

73. American Express, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

73 a The **Recent Payment** information is missing and Experian has this information.

73 b The **Monthly Payment** information is missing and Experian has this information.

73 c The **Credit Limit** information is missing and Experian has this information.

73 d The **Payment History** information is missing and Experian has this information.

74. Bank of America 440066XXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

74 a The **Account Number** information is missing and Experian has this information.

74 b The **Recent Payment** information is missing and Experian has this information.

74 c The **Monthly Payment** information is missing and Experian has this information.

74 d The **Terms** information is missing and Experian has this information.

75. BMW Financial Services 100313XXXXXXXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

75 a The **Account Number** information is missing and Experian has this information.

75 b The **Balance** information is missing and Experian has this information.

75 c The **Balance Uploaded** information is missing and Experian has this information.

75 d The **Recent Payment** information is missing and Experian has this information.

75 e The **Monthly Payment** information is missing and Experian has this information.

75 f The **Highest Balance** information is missing and Experian has this information.

75 g The **Payment History** information is missing and Experian has this information.

76. CBNA 512106XXXXXXXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

76 a The **Account Number** information is missing and Experian has this information.

76 b The **Balance** as inaccurate.

76 c The **Recent Payment** information is missing and Experian has this information.

76 d The **Monthly Payment** information is missing and Experian has this information.

76 e The **Terms** information is missing and Experian has this information.

76 f The **Payment History** information is missing and Experian has this information.

77. CCS/First National Bank 423980XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

77 a The **Account Number** information is missing and Experian has this information.

77 b The **Balance** as inaccurate.

77 c The **Recent Payment** information is missing and Experian has this information.

77 d The **Monthly Payment** information is missing and Experian has this information.

77 e The **Terms** information is missing and Experian has this information.

78. CCS/First Saving Bank 543360XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

78 a The **Account Number** information is missing and Experian has this information.

78 b The **Balance** as inaccurate.

78 c The **Recent Payment** information is missing and Experian has this information.

78 d The **Monthly Payment** information is missing and Experian has this information.

78 e The **Terms** information is missing and Experian has this information.

79. Celtic Bank/Contfinco 534636XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

79 a The **Account Number** information is missing and Experian has this information.

79 b The **Balance** as inaccurate.

79 c The **Recent Payment** information is missing and Experian has this information.

79 d The **Monthly Payment** information is missing and Experian has this information.

79 e The **Terms** information is missing and Experian has this information.

79 f The **Payment History** information is missing and Experian has this information.

80. Citi Cards/CitiBank 542418XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

80 a The **Account Number** information is missing and Experian has this information.

80 b The **Balance** as inaccurate.

80 c The **Recent Payment** information is missing and Experian has this information.

80 d The **Monthly Payment** information is missing and Experian has this information.

80 e The **Terms** information is missing and Experian has this information.

80 f The **Payment History** information is missing and Experian has this information.

81. Communication FCU 433520XXXXXX, February 6, 2025 report (Ex. A Before Annual Credit Report)

81 a The **Account Number** information is missing and Experian has this information.

81 b The **Balance** as inaccurate.

81 c The **Monthly Payment** information is missing and Experian has this information.

81 d The **Terms** information is missing and Experian has this information.

81 e The **Payment History** information is missing and Experian has this information.

82. Cortrust Bank NA 543668XXXXXX, February 6, 2025 report (Ex. A Before Annual Credit Report)

82 a The **Account Number** information is missing and Experian has this information.

82 b The **Balance** as inaccurate.

82 c The **Recent Payment** information is missing and Experian has this information.

82 d The **Monthly Payment** information is missing and Experian has this information.

82 e The **Terms** information is missing and Experian has this information.

82 f The **Payment History** information is missing and Experian has this information.

83. Discover Bank 601120XXXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

83 a The **Account Number** information is missing and Experian has this information.

83 b The **Balance** as inaccurate.

83 c The **Recent Payment** information is missing and Experian has this information.

83 d The **Monthly Payment** information is missing and Experian has this information.

83 e The **Terms** information is missing and Experian has this information.

83 f The **Payment History** information is missing and Experian has this information.

84. FSB Blaze 518213XXXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

84 a The **Account Number** information is missing and Experian has this information.

84 b The **Balance** as inaccurate.

84 c The **Recent Payment** information is missing and Experian has this information.

84 d The **Monthly Payment** information is missing and Experian has this information.

84 e The **Terms** information is missing and Experian has this information.

85. JPMCB CARD 414720XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

85 a The **Account Number** information is missing and Experian has this information.

85 b The **Balance** as inaccurate.

85 c The **Recent Payment** information is missing and Experian has this information.

85 d The **Monthly Payment** information is missing and Experian has this information.

85 e The **Terms** information is missing and Experian has this information.

85 f The **Payment History** information is missing and Experian has this information.

86. JPMCB CARD 426690XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

86 a The **Account Number** information is missing and Experian has this information.

86 b The **Balance** as inaccurate.

86 c The **Recent Payment** information is missing and Experian has this information.

86 d The **Monthly Payment** information is missing and Experian has this information.

86 e The **Terms** information is missing and Experian has this information.

86 f The **Payment History** information is missing and Experian has this information.

87. JPMCB CARD 438857XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

87 a The **Account Number** information is missing and Experian has this information.

87 b The **Balance** as inaccurate.

87 c The **Recent Payment** information is missing and Experian has this information.

87 d The **Monthly Payment** information is missing and Experian has this information.

87 e The **Terms** information is missing and Experian has this information.

87 f The **Payment History** information is missing and Experian has this information.

88. JPMCB CARD546604XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

88 a The **Account Number** information is missing and Experian has this information.

88 b The **Balance** as inaccurate.

88 c The **Recent Payment** information is missing and Experian has this information.

88 d The **Monthly Payment** information is missing and Experian has this information.

88 e The **Terms** information is missing and Experian has this information.

88 f The **Payment History** information is missing and Experian has this information.

89. Navy Federal CR Union5000001XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

89 a The **Account Number** information is missing and Experian has this information.

89 b The **Balance** as inaccurate.

89 c The **Recent Payment** information is missing and Experian has this information.

89 d The **Monthly Payment** information is missing and Experian has this information.

89 e The **Terms** information is missing and Experian has this information.

89 f The **Payment History** information is missing and Experian has this information.

90. Tinker FCU 470415XXXXX, February 6, 2025 report (Ex. A Before **Annual Credit Report**)

90 a The **Account Number** information is missing and Experian has this information.

90 b The **Balance** as inaccurate.

90 c The **Recent Payment** information is missing and Experian has this information.

90 d The **Monthly Payment** information is missing and Experian has this information.

90 e The **Terms** information is missing and Experian has this information.

90 f The **Payment History** information is missing and Experian has this information.

91. Chapter 7 Bankruptcy 22112371SAH, February 6, 2025 report (Ex. A Before Annual Credit Report)

91 The Chapter 7 Bankruptcy as inaccurate.

92. Plaintiff requested Plaintiff's full file disclosure under Section 1681g of the FCRA.

93. The full file disclosure is *more* than what is provided in a consumer report or a credit report – it is all the information the credit bureau has on the consumer.

94. But Defendant Experian refused to give this to Plaintiff.

95. The law is very simple under Section 1681g -- provide everything to Plaintiff that is in Plaintiff's file.

96. Defendant Experian knew Plaintiff had requested this information and had identified who the Plaintiff was and released the full file disclosure to annual credit report dot com.

97. Defendant Experian refused to provide all the data contained in its files.

98. As one simple example, there are errors with missing data, even though Defendant Experian has this data.

99. Defendant Experian has deprived Plaintiff of Plaintiff's right to see everything in Plaintiff's file that is required to be provided to Plaintiff under Section 1681g.

100. Without having access to all the information in Plaintiff's file, Plaintiff is unable to determine if there is additional inaccurate/incomplete information that Plaintiff needs to dispute had Plaintiff been given the full file as required by law.
101. Defendant Experian omitted information on all of the above information listed above.
102. Defendant Experian created a materially misleading impression that harmed Plaintiff by omitting critical details. Ex. C
103. Defendant Experian wasted Plaintiff time.
104. Defendant Experian caused emotional distress upon Plaintiff.
105. When Defendant Experian and Experian legal counsel will see everything in this Complaint is true.

EXPERIAN MARCH 17, 2025 RE-INVESTIGATION VIOLATED 15 U.S.C. §1681g BY DISCLOSING OMITTED INFORMATION AFTER PLAINTIFF DISPUTE AND EXPERIAN MARCH 17, 2025 RE-INVESTIGATION RESULTS IS A VIOLATION OF 15 U.S.C. §1681i (Super Willful Actions and Inactions) Ex. B

106. BMW Financial Service/Credit 100313...
 - 106 a **Account Number** is still incomplete after Experian re-investigation.
 - 106 b **Recent Balance** is still incomplete after Experian re-investigation.
 - 106 c **High Balance** is still incomplete after Experian re-investigation.

106 d **Payment History** is still incomplete after Experian re-investigation.

106 e October of 2022 **Payment History** is still incomplete after Experian re-investigation.

107. American Express 3499924574460473...

107 a **Monthly Payment** is still incomplete after Experian re-investigation.

107 b **Credit Limit** is still incomplete after Experian re-investigation.

107 c **Payment History** is still incomplete after Experian re-investigation.

108. Citi Cards/CitiBank 542418130451...

108 a **Account Number** is still incomplete after Experian re-investigation.

108 b **Terms** is still incomplete after Experian re-investigation.

108 c **Monthly Payment** is still incomplete after Experian re-investigation.

108 d **Payment History** is still incomplete after Experian re-investigation.

108 e February of 2025 **Payment History** is still incomplete after Experian re-investigation.

108 f October of 2022 **Payment History** is still incomplete after Experian re-investigation.

108 g November of 2022 **Payment History** is still incomplete after Experian re-investigation.

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109. Bank of America 440066903539...

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110. JPMCB CARD 426690206452...

110 a **Account Number** is still incomplete after Experian re-investigation.

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111. CBNA 512106521599...

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111 a **Terms** is still incomplete after Experian re-investigation.

111 b **Monthly Payment** is still incomplete after Experian re-investigation.

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112. JPMCB CARD 438857608315...

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114. JPMCB CARD 54664202031...

114 a **Account Number** is still incomplete after Experian re-investigation.

114 b **Terms** is still incomplete after Experian re-investigation.

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115. Cortrust Bank NA 543668400024...

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116. Celtic Bank/Contfinco 534636029612...

116 a **Account Number** is still incomplete after Experian re-investigation.

116 b **Terms** is still incomplete after Experian re-investigation.

116 c **Recently Balance** is still incomplete after Experian re-investigation.

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116 wwww March of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

116 xxxx March of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

117. Discover Bank 601120885568...

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118. American Express 3499924574460473...

118 a **Account Number** is still incomplete after Experian re-investigation.

118 b **Monthly Payment** is still incomplete after Experian re-investigation.

118 c **Credit Limit or Original Amount** is still incomplete after Experian re-investigation.

119. Bank of America 440066903539...

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119 qq August of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

119 rr May of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

119 ss May of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

119 tt April of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

119 uu April of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

119 vv March of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

119 ww March of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

120. BMW Financial Services/Credit 100313...

120 a **Account Number** is still incomplete after Experian re-investigation.

120 b **Recent Balance** is still incomplete after Experian re-investigation.

120 c **Monthly Payment** is still incomplete after Experian re-investigation.

120 d **High Balance** is still incomplete after Experian re-investigation.

120 e October of 2022 **Payment History** is still incomplete after Experian re-investigation.

120 f August of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

121. CBNA 512106521599...

121 a **Account Number** is still incomplete after Experian re-investigation.

121 b **Terms** is still incomplete after Experian re-investigation.

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121 aa March of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

122. CITI CARDS/CITIBANK 542418130451...

122 a **Account Number** is still incomplete after Experian re-investigation.

122 b **Terms** is still incomplete after Experian re-investigation.

122 c **Monthly Payment** is still incomplete after Experian re-investigation.

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123. Communication FCU 433520530007...

123 a **Account Number** is still incomplete after Experian re-investigation.

123 b **Terms** is still incomplete after Experian re-investigation.

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124. Cortrust Bank NA 543668400024...

124 a **Account Number** is still incomplete after Experian re-investigation.

124 b **Terms** is still incomplete after Experian re-investigation.

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124 vv March of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

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125. Discover Bank 601120885568...

125 a **Account Number** is still incomplete after Experian re-investigation.

125 b **Terms** is still incomplete after Experian re-investigation.

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126. JPMCB Card 426690206452...

126 a **Account Number** is still incomplete after Experian re-investigation.

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127. JPMCB Card 438857608315...

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127 rr October of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

127 ss September of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

127 tt September of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

127 uu August of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

127 vv August of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128. JPMCB Card 546604202031...

128 a **Account Number** is still incomplete after Experian re-investigation.

128 b **Terms** is still incomplete after Experian re-investigation.

128 c **Monthly Payment** is still incomplete after Experian re-investigation.

128 d January of 2023 **Payment History** is still incomplete after Experian re-investigation.

128 e February of 2023 **Payment History** is still incomplete after Experian re-investigation.

128 f March of 2023 **Payment History** is still incomplete after Experian re-investigation.

128 g April of 2023 **Payment History** is still incomplete after Experian re-investigation.

128 h May of 2023 **Payment History** is still incomplete after Experian re-investigation.

128 i June of 2023 **Payment History** is still incomplete after Experian re-investigation.

128 j July of 2023 **Payment History** is still incomplete after Experian re-investigation.

128 k December of 2022 **Payment History** is still incomplete after Experian re-investigation.

128 l January of 2025 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 m January of 2025 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 n December of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 o December of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 p November of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 q November of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 r October of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 s October of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 t September of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 u September of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 v August of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 w August of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 x July of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 y July of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 z June of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 aa June of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 bb May of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 cc May of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 dd April of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 ee April of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 ff March of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 gg March of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 hh February of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 ii February of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 jj January of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 kk January of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 ll December of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 mm December of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 nn November of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 oo November of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 pp October of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 qq October of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 rr September of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 ss September of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

128 tt August of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

128 uu August of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129. Navy Federal Cr Union 5000001406095540601...

129 a **Account Number** is still incomplete after Experian re-investigation.

129 b **Terms** is still incomplete after Experian re-investigation.

129 c **Monthly Payment** is still incomplete after Experian re-investigation.

129 d October of 2022 **Payment History** is still incomplete after Experian re-investigation.

129 e November of 2022 **Payment History** is still incomplete after Experian re-investigation.

129 f January of 2025 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 g January of 2025 **Actual Amount Paid** is still incomplete after Experian re-investigation.

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129 p August of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

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129 r July of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 s July of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 t June of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 u June of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 v May of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 w May of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 x April of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 y April of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 z March of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 aa March of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 bb February of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 cc February of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 dd January of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 ee January of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 ff December of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 gg December of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 hh November of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 ii November of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 jj October of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 kk October of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 ll September of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 mm September of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 nn August of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 oo August of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 pp May of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 qq May of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 rr May of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 ss May of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 tt April of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 uu April of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

129 vv March of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

129 ww March of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130. Tinker FCU 9675552...

130 a **Account Number** is still incomplete after Experian re-investigation.

130 b **Monthly Payment** is still incomplete after Experian re-investigation.

130 c January of 2025 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 d January of 2025 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 e December of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 f December of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 g November of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 h November of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 i October of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 j October of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

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130 o July of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 p July of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 q June of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 r June of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 s May of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

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130 u April of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 v April of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 w March of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 x March of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

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130 z February of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 aa January of 2024 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 bb January of 2024 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 cc December of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 dd December of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 ee November of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 ff November of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 gg October of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 hh October of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 ii September of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 jj September of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 kk August of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 ll May of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

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130 nn May of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 oo May of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 pp April of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 qq April of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

130 rr March of 2023 **Scheduled Payment Amount** is still incomplete after Experian re-investigation.

130 ss March of 2023 **Actual Amount Paid** is still incomplete after Experian re-investigation.

131. Tinker FCU 470415150098...

131 a **Account Number** is still incomplete after Experian re-investigation.

131 b **Terms** is still incomplete after Experian re-investigation.

131 c **Monthly Payment** is still incomplete after Experian re-investigation.

131 d **Recent Balance** is still incomplete after Experian re-investigation.

132. Tinker FCU 470415150086...

132 a **Account Number** is still incomplete after Experian re-investigation.

132 b **Terms** is still incomplete after Experian re-investigation.

132 c **Monthly Payment** is still incomplete after Experian re-investigation.

132 d April of 2021 **Payment History** is still incomplete after Experian re-investigation.

VANCE DOTSON ACTUAL DAMAGES FROM EXPERIAN ACTION AND INACTIONS

The Plaintiff has experienced significant emotional distress due to Experian's failure to disclose all information in his file and conduct a reasonable reinvestigation as required. Despite the Plaintiff's efforts (wasted time) to identify and circle the incomplete items in his file, Experian's delayed and inadequate response has exacerbated his distress. As a result, the Plaintiff has sought and seeking counseling

to address the emotional impact of Experian's actions. Since May 20, 2025, the Plaintiff has been receiving counseling services through BetterHelp, incurring a cost of \$65 per week. Ex.

**XI. FIRST CLAIM FOR RELIEF
(Defendant Experian)
15 U.S.C. § 1681e(b)**

133. Plaintiff re-alleges, and incorporates by reference, paragraphs one through 132 above.

134. Defendant Experian has violated 15 U.S.C. §1681e(b) in that they failed to maintain a procedure designed to assure maximum possible accuracy.

135. Defendant Experian has caused injury in fact, by causing, among other effects, mental and emotional distress, damage to credit reputation, and resulting in credit damages to Plaintiff.

136. Defendant Experian has done so either negligently or willfully.

137. Plaintiff is entitled to actual damages, punitive damages, and costs pursuant to 15 U.S.C. §1681(o).

138. Alternatively, Plaintiff is entitled to actual damages, and costs if the violation is negligent, pursuant to 15 U.S.C. § 1681n, \$1,000 per incident.

**XII. SECOND CLAIM FOR RELIEF
(Defendant Experian)
15 U.S.C. §1681i(a)**

139. Plaintiff re-alleges, and incorporates by reference, paragraphs one through 138 above.

140. Defendant Experian has violated 15 U.S.C. § 1681i(a) in that they failed to conduct a reasonable investigation on the disputed information whatsoever.

141. Defendant Experian has caused injury in fact, by causing, among other effects, mental and emotional distress, damage to credit reputation, and resulting in credit damages to Plaintiff.

142. Defendant Experian has done so either negligently or willfully.

143. Plaintiff is entitled to actual damages, punitive damages, and costs pursuant 15 U.S.C. § 1681o.

144. Alternatively, Plaintiff is entitled to actual damages, and costs if the violation is negligent, pursuant to 15 U.S.C. §1681n, \$1,000 per incident.

**XIII. THIRD CLAIM FOR RELIEF
(Defendant Experian)
15 U.S.C. §1681i(a)(2)**

145. Plaintiff re-alleges, and incorporates by reference, paragraphs one through 144 above.

146. Defendant Experian has violated 15 U.S.C. § 1681i(a)(2) in that they failed to consider and forward all relevant information to the furnisher of information.

147. Defendant Experian has caused injury in fact, by causing, among other effects, mental and emotional distress, damage to credit reputation, and resulting in credit damages to Plaintiff.

148. Defendant Experian has done so either negligently or willfully.

149. Plaintiff is entitled to actual damages, punitive damages, and costs pursuant 15 U.S.C. § 1681o.

150. Alternatively, Plaintiff is entitled to actual damages, and costs if the violation is negligent, pursuant to 15 U.S.C. §1681n, \$1,000 per incident.

XIV. FOURTH CLAIM FOR RELIEF
(Defendant Experian)
15 U.S.C. §1681i(a)(4)

151. Plaintiff re-alleges, and incorporates by reference, paragraphs one through 150 above.

152. Defendant Experian has violated 15 U.S.C. §1681i(a)(4) in that they failed to delete information that was inaccurate or could not be verified.

153. Defendant Experian has caused injury in fact, by causing, among other effects, mental and emotional distress, damage to credit reputation, and resulting in credit damage to Plaintiff.

154. Defendant Experian has done so either negligently or willfully.

155. Plaintiff is entitled to actual damages, punitive damages, and costs pursuant to 15 U.S.C. § 1681o.

156. Alternatively, Plaintiff is entitled to actual damages, and costs if the violation is negligent, pursuant to 15 U.S.C. §1681n, \$1,000 per incident.

**XV. FIFTH CLAIM FOR RELIEF
(Defendant Experian)
15 U.S.C. §1681i(a)(5)**

157. Plaintiff re-alleges, and incorporates by reference, paragraphs one through 156 above.

158. Defendant Experian has violated 15 U.S.C. § 1681i(a)(5) in that they failed to have a procedure to prevent the reoccurrence of inaccurate or unverifiable information.

159. Defendant Experian has caused injury in fact, by causing, among other effects, mental and emotional distress, damage to credit reputation, and resulting in credit damages to Plaintiff.

160. Defendant Experian has done so either negligently or willfully.

161. Plaintiff is entitled to actual damages, punitive damages, and costs pursuant 15 U.S.C. § 1681o.

162. Alternatively, Plaintiff is entitled to actual damages, and costs if the violation is negligent, pursuant to 15 U.S.C. §1681n, \$1,000 per incident.

**XVI. SIXTH CLAIM FOR RELIEF
(Defendant Experian)
15 U.S.C. §1681i(7)**

163. Plaintiff re-alleges, and incorporates by reference, paragraphs one through 162 above.

164. Defendant Experian has violated 15 U.S.C. § 1681i(7) in that they failed to provide a written description of the procedures used to determine the accuracy and completeness of the disputed information.

165. Defendant Experian has caused injury in fact, by causing, among other effects, mental and emotional distress, damage to credit reputation, and resulting in credit damages to Plaintiff.

166. Defendant Experian has done so either negligently or willfully.

167. Plaintiff is entitled to actual damages, punitive damages, and costs pursuant 15 U.S.C. § 1681o.

168. Alternatively, Plaintiff is entitled to actual damages, and costs if the violation is negligent, pursuant to 15 U.S.C. §1681n, \$1,000 per incident.

XVII. SEVENTH CLAIM FOR RELIEF
(Defendant Experian)
15 U.S.C. §1681g(a)(1)

170. Defendant Experian has caused injury in fact, by causing, among other effects, mental and emotional distress, damage to credit reputation, and resulting in credit damages to Plaintiff.

171. Defendant Experian has done so either negligently or willfully.

172. Plaintiff is entitled to actual damages, punitive damages, and costs pursuant 15 U.S.C. § 1681o.

173. Alternatively, Plaintiff is entitled to actual damages, and costs if the violation is negligent, pursuant to 15 U.S.C. §1681n, \$1,000 per incident.

A. Judgment for the violations occurred for violating the FCRA by Experian;

B. Statutory damages pursuant to 15 USC § 1681n and 15 U.S.C § 1681o;

C. Cost and expense incurred in this action pursuant to 15 USC § 1681n and 15 U.S.C § 1681o;

D. For such other and further relief as the Court may deem just and proper.

WHEREFORE, Plaintiff Vance Dotson respectfully request that judgment be entered against the Defendants, Experian Information Services LLC in an amount to be determined by the Jury.

Vance Dotson

Vance Dotson

425 W. Wilshire Blvd Ste., E

Oklahoma City, OK 73116

405-406-7323

vancedotson@yahoo.com

ATTACHED EXHIBIT LIST

- A. Plaintiff Experian Consumer Disclosure, February 6, 2025
- B. Plaintiff Experian Re-Investigation, March 17, 2025
- C. FTC Opinion Letter.
- D. Plaintiff Dispute Letter
- E. Plaintiff Counseling Receipts 1, 2, 3, 4, 5, 6
- F. Plaintiff Full Experian Consumer Disclosure, February 6, 2025